



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

October 4, 2024

BY ECF

The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: ***United States v. Kevin Perez, 23 Cr. 99 (LJL)***

Dear Judge Liman:

The Government respectfully writes in response to defendant Kevin Perez's motion to adjourn the trial—currently scheduled for November 12, 2024—until March 2025. (Dkt. 134). For the reasons articulated at the October 2, 2024 conference, the Government opposes an adjournment until March 2025. Among other things, Perez has already received one prior adjournment and is now on his fourth set of lawyers. In addition, two of the undersigned Assistant U.S. Attorneys are scheduled to begin another trial on February 24, 2025, and the other undersigned Assistant U.S. Attorney is scheduled to begin another trial on March 10, 2025.

Nevertheless, the Government does not object to a shorter adjournment of the trial date in order to permit defense counsel additional time to review discovery and prepare for trial. The Government is generally available December 2, 2024 through December 20, 2024, and January 13, 2025 through January 31, 2025. In the event that the Court grants an adjournment, the Government respectfully requests that the time between November 12, 2024 and the new trial date be excluded in the interest of justice, *see* 18 U.S.C. § 3161(h)(7)(A), to accommodate the defendant's request for additional time to prepare for trial.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/
Michael R. Herman / James A. Ligtenberg /
Patrick R. Moroney
Assistant United States Attorneys
(212) 637-2221 / -2665 / -2330

cc: All counsel of record (by ECF)